K&L GATES

October 29, 2024

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VIA ECF

Hon. Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: ***Revlon Consumer Products LLC et al. v. Give Back Beauty S.A. et al.,***
         Case No. 1:24-cv-6438-ER-RWL – Defendant Ashley Fass' Deadline to Answer

Dear Judge Ramos:

While we are counsel of record for all Defendants in the above-referenced action, we write only on behalf of Defendant Ashley Fass in anticipation of her October 30, 2024 deadline to respond to Revlon Consumer Products LLC's ("Revlon") and Elizabeth Arden, Inc.'s ("Elizabeth Arden," collectively with Revlon, referred to herein as "Plaintiffs") Complaint, as well as the October 30, 2024 pre-motion conference.

Ms. Fass is currently in the process of retaining new counsel, independent of the other defendants. In light of this, we respectfully request, on Ms. Fass' behalf, that the Court grant Ms. Fass an additional thirty days to respond to the Complaint to afford her new counsel sufficient time to enter an appearance and prepare a response on her behalf.

Additionally, in light of this anticipated substitution of counsel for Ms. Fass, we write to inform the Court that K&L Gates is prepared to make argument on October 30, 2024 regarding the matters raised in Plaintiffs' pre-motion conference request (Dkt. 118) but will not be in a position to make representations or commitments specific to Ms. Fass.

We asked Plaintiffs' counsel for a thirty-day extension of Ms. Fass' responsive pleading deadline. Plaintiffs are amenable to an extension of time but stated they believe thirty days is

excessive. We would thus respectfully request the Court determine an appropriate extension of time, triggered from the date Ms. Fass' substitution of counsel is filed.

Thank you for your consideration of and attention to this matter.

Respectfully submitted,

Ronie Schmelz

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